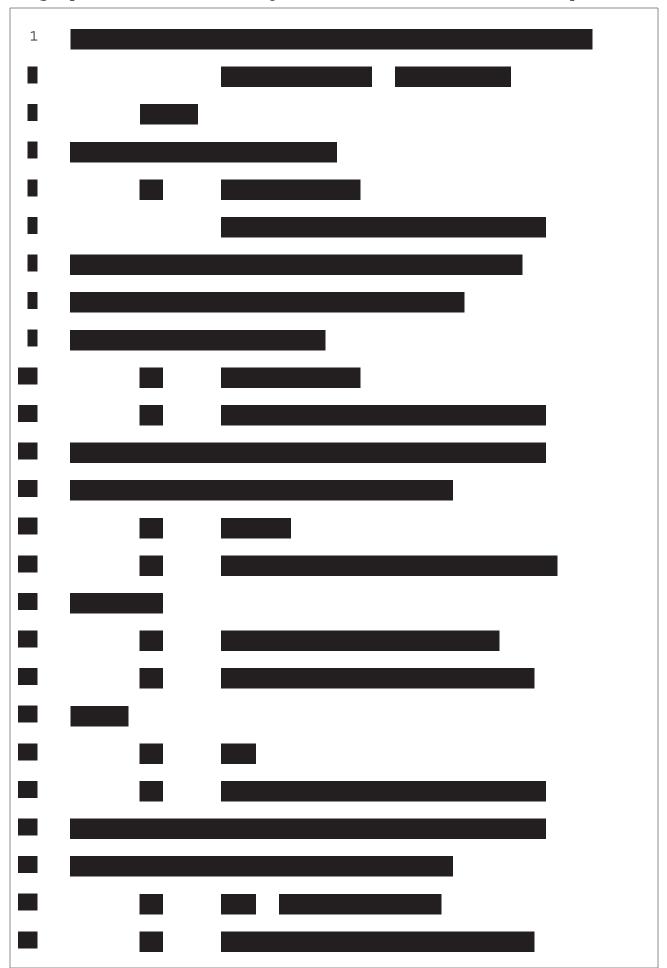
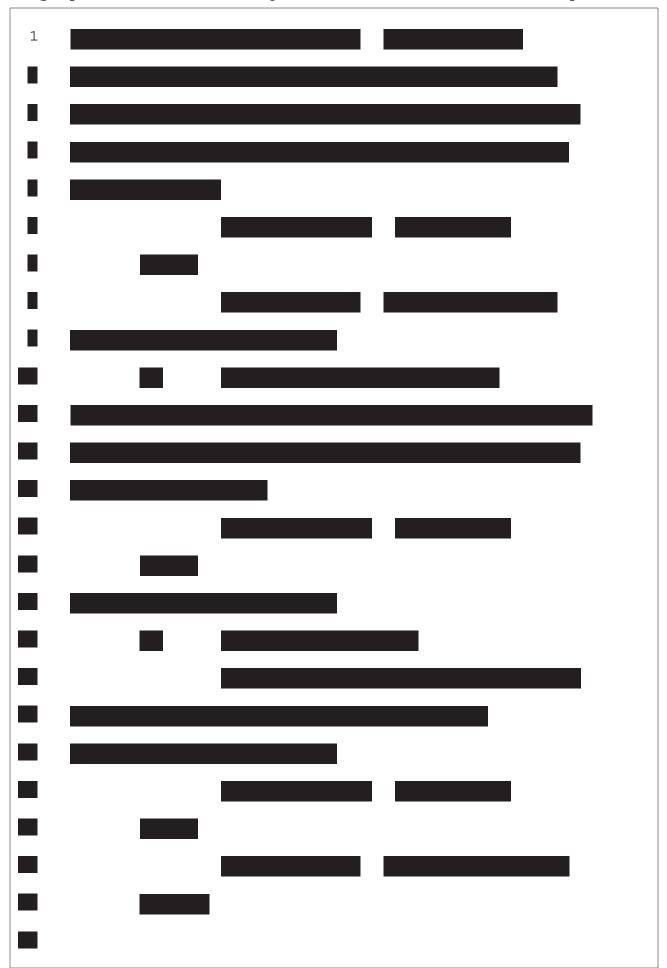
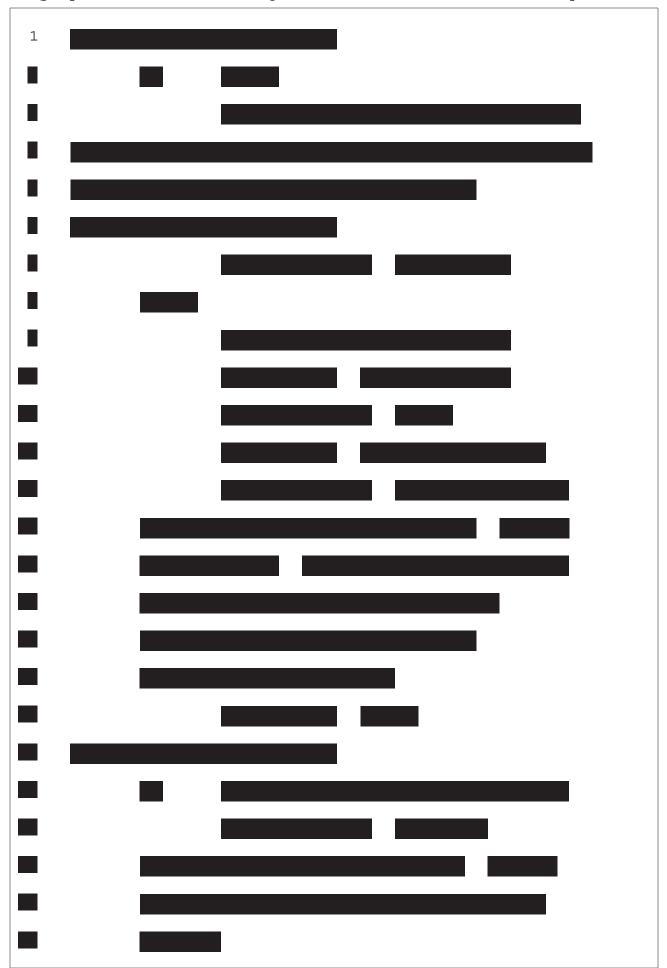
EXHIBIT 316

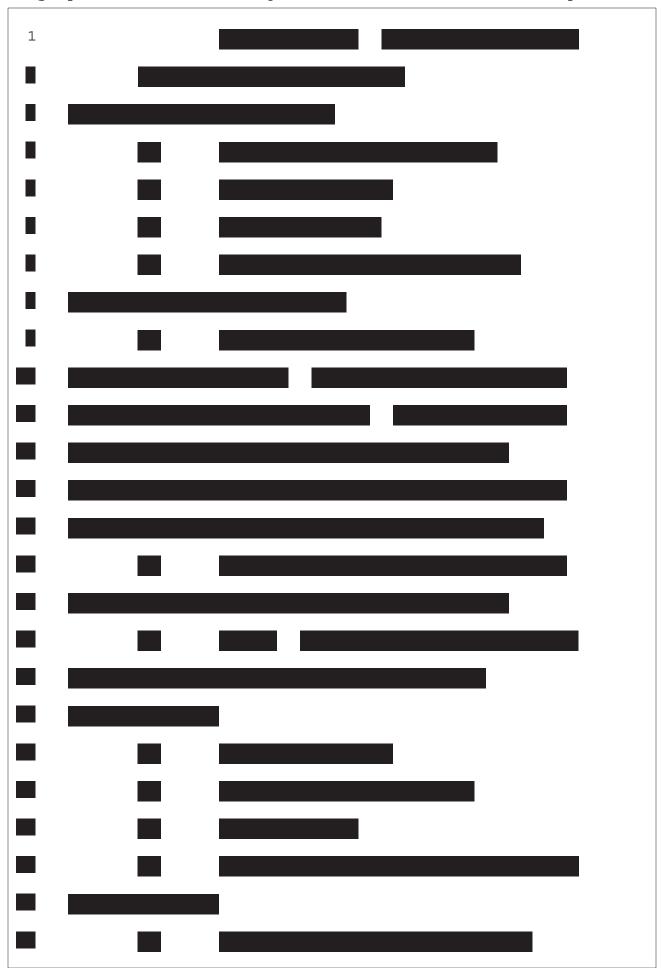
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1
             UNITED STATES DISTRICT COURT
           FOR THE NORTHERN DISTRICT OF OHIO
2.
                   EASTERN DIVISION
3
     IN RE: NATIONAL
     PRESCRIPTION
                                MDL No. 2804
     OPIATE LITIGATION
5
                              ) Case No.
                                 1:17-MD-2804
6
     THIS DOCUMENT RELATES
                             ) Hon. Dan A.
     TO ALL CASES
                              ) Polster
8
                FRIDAY, JANUARY 4, 2019
9
      HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
10
                CONFIDENTIALITY REVIEW
11
12
               Videotaped deposition of Ramona
13
    Sullins, held at the offices of JONES DAY, 77
    West Wacker Drive, Chicago, Illinois,
14
    commencing at 7:31 a.m., on the above date,
15
    before Carrie A. Campbell, Registered
16
    Diplomate Reporter, Certified Realtime
17
    Reporter, Illinois, California & Texas
18
19
    Certified Shorthand Reporter, Missouri &
20
    Kansas Certified Court Reporter.
2.1
              GOLKOW LITIGATION SERVICES
22
          877.370.3377 ph | 917.591.5672 fax
                    deps@golkow.com
2.3
24
25
```











1 6 And you believe that occurred 0. sometime in 2010; is that correct? 8 Α. '10 or '11. I don't recall. 9 Before that rollout occurred, Ο. 10 did Walmart have a monitoring program in 11 place? 12 Α. Yes. 13 0. And what was that program? 14 Α. I believe it was a 405 report, and they monitored orders as they came in. 15 16 0. Okay. And what do you mean by -- when you say "they monitored orders as 17 18 they came in, " what does that mean? 19 So the distribution center did 20 and the associates did. 21 Are the associates at the 22 distribution center? 23 Α. Yes. Okay. Anyone other than the 24 associates at the distribution center that 25

- would monitor orders?
- MS. FUMERTON: Objection.
- Form.
- 4 QUESTIONS BY MR. BOWER:
- 5 Q. And I'm just trying -- just so
- 6 the record is clear, I'm just trying to
- ⁷ understand your answer.
- You said "the distribution
- 9 center did and the associates did." Are
- those two different things in your mind?
- 11 A. They're all at the distribution
- 12 center.
- 0. And what were the associates
- doing prior to the rollout of Reddwerks?
- A. So my understanding is that
- they would -- they would let their manager
- know if they saw an order that was out of the
- ordinary.
- Q. What do you mean by "out of the
- ordinary"?
- A. Like, for example, ReliOn
- insulin, we had orders that would -- where
- the pharmacy would think that they were
- ordering ten vials of insulin, and they
- 25 actually ordered a hundred of them because

- 1 they were in packs of ten. So those would be
- 2 examples of what they would bring to their
- 3 attention.
- 4 Q. And in fact, Walmart had an
- 5 automatic cut for those instant orders,
- 6 correct?
- 7 MS. FUMERTON: Objection.
- 8 Form.
- 9 Go ahead.
- THE WITNESS: For the what now?
- 11 QUESTIONS BY MR. BOWER:
- 12 O. For those insulin orders that
- you just -- the example that you just
- 14 provided, Walmart actually had an automatic
- cut for those orders, didn't they?
- MS. FUMERTON: Objection.
- Form.
- THE WITNESS: It was a manual
- cut; it wasn't automatic.
- QUESTIONS BY MR. BOWER:
- Q. A manual cut that was
- 22 automatically applied to insulin orders,
- 23 correct?
- MS. FUMERTON: Objection.
- Form.

```
1
                                 They would call
                  THE WITNESS:
           the store to inform them that they had
 2.
 3
           placed -- if they really wanted a
 4
           hundred because, I mean, the
 5
           refrigerator didn't hold a hundred.
 6
    QUESTIONS BY MR. BOWER:
 7
           Q.
                  Right.
 8
                  And that was specific to
    insulin, correct?
10
                  That's correct.
           Α.
11
           0.
                  Okay. What about with respect
12
    to Schedule II narcotics, what were the DCs
13
    doing in 2008?
14
                  MS. FUMERTON: Objection.
15
           Form.
16
                  THE WITNESS: My understanding
17
           is they would do the same thing with
18
           that.
    QUESTIONS BY MR. BOWER:
19
20
                  And where does that
           Q.
21
    understanding come from?
22
                  Just from when I was training
           Α.
23
    in 2008, when I was out at the DCs training.
24
                         So what specifically did
                  Okay.
25
    you learn in connection with your training
```

```
that the DCs were doing for Schedule II
 1
 2
    narcotics?
 3
                  MS. FUMERTON: Objection.
 4
           Form.
 5
                  THE WITNESS: So again, they
           would look at that paper and let their
 6
 7
           supervisor or manager know that this
           appears to be out of the ordinary or
 8
 9
           unusual.
10
    QUESTIONS BY MR. BOWER:
11
                  And at that point -- and we're
           Q.
12
    talking 2008, correct?
13
           Α.
                  Yes.
14
                  At that point, how was DC 6045
    receiving orders? They were paper, correct?
15
16
                  So those would come in
           Α.
    electronically. They're printed on paper.
17
18
           Ο.
                  They would come in
    electronically once a day?
19
20
           Α.
                  That's correct.
21
                  And then they would print it on
           Ο.
22
    paper at the DC?
23
                  That's correct.
           Α.
                  And then what would happen to
24
           Ο.
25
    those papers?
```

- 1 A. Well, first they would print
- the 222 form, sign those, and then that and
- 3 the paper order would be put together in a
- 4 packet, and the associates would fill orders
- 5 based on that paper order.
- 6 Q. And was it the practice for the
- orders to be filled and shipped the same day
- 8 they came in?
- 9 A. Yes.
- Q. And approximately how many
- orders came in to DC 6045 on a daily basis
- during this time period?
- 13 A. I don't recall how many orders
- 14 came in.
- Q. Would it have been in the
- hundreds of orders? Could it have been in
- the hundreds of orders per day?
- A. Well, they filled store
- order -- store only got an order once a week
- of C-IIs. So if you divide it up, however
- 21 many stores we had at the time, that's how
- 22 many orders they would -- processed, four
- ²³ days a week.
- Q. That's fine.
- You said four days a week?

